

**ENTERED**

August 26, 2024

Nathan Ochsner, Clerk

# STATEMENT IN SUPPORT OF PROBABLE CAUSE

IN RE: Shania Nichele ELLIS

I, Ramon Deliz, declare and state as follows:

1. On August 25, 2024, Homeland Security Investigations (HSI), Laredo Office Special Agents responded to the Gate of Las Americas International Bridge (Bridge 1) in Laredo, Texas (TX), regarding a seizure by United States Customs and Border Protection (CBP) Officers of 24.407 kilograms of crystal methamphetamine, 655.6 grams of cocaine and 494.5 grams of black heroin. As a result, CBP Officers detained Shania Nichele ELLIS who was transporting the narcotics inside a vehicle driven by her.
2. CBO Officers explained that ELLIS arrived at the Gate to the Americas International Bridge (Bridge 1) driving a gray Nissan Rouge bearing temporary Texas paper tags (DW550688). Bridge 1 is only for individuals who are enrolled in the Trusted Traveler Program. ELLIS provided a negative oral declaration for controlled substances, among other prohibited items. ELLIS claimed she was coming back to San Antonio, TX after attending a wedding in Sabinas Hidalgo, Nuevo Leon, Mexico (MX). Record checks revealed no previous crossings. During the primary inspection, CBP Officer Raul Sarli Jr decided to refer ELLIS to secondary for further inspection based on she not being enrolled in the Trusted Traveler Program.
3. During secondary inspection, CBP Officer Anthony Sanchez conducted an inspection of the vehicle and by tapping on the passenger side panels he noticed inconsistencies in sound across the surface of the panel. After opening the rear liftgate, he noticed a small access door at that area. After making a cavity inside the liftgate panel he discovered several bundles.
4. After the discovery of the bundles, CBP Officer Jesus Ruiz and his canine "Jezz" (190168) performed an inspection of the vehicle and the canine alerted to the possible presence of controlled substances at the area where the bundles were discovered. The canine also alerted to the possible presence of controlled substances at the door seams in the passenger side. At that time the vehicle was escorted to the Non-Intrusive Inspection Z Portal Machine at the Juarez-Lincoln International Bridge (Bridge 2). During the inspection, CBP

I find probable cause that the defendant(s) committed an offense against the laws of the United States and may be therefore further detained pending presentment before a judicial officer.

deliz observed anomalies around the doors of the vehicle.

f the inside of the driver and passenger side panels, several by CBP Officer Carlos Pinero. A field test with GEMINI ty-four (44) bundles contained a substance with properties e; two (2) bundles contained a substance with properties similar contained a substance with properties similar to black heroin.

August 26, 2024, 03:23 PM, at Laredo, Texas.



Christopher dos Santos  
United States Magistrate Judge

6. During the inspection and while taking photographs, CBP Officer Humbert Y. Morales found two Texas license plates inside the vehicle. The license plate number were THF6500. A query of the license plate revealed that is registered to a silver 2013 Nissan under the name of Shania Nichele Ellis and with a registered address in San Antonio, TX.
7. On that same date, HSI Agents Ramon Deliz, Jose Melero and Vicente Reyes attempted to interview ELLIS, but they observed she was disoriented, her speech was heavily slurred, and her eyes were unable to focus. She stated that she had taken a prescribed 2 ml of clonazepam two hours before being encountered. The agents discontinued the attempt to interview. On August 26, 2024, HSI Agents Reyes and Deliz observed that ELLIS was alert and proceeded to interview her after informing her of her constitutional rights and she voluntarily waived her rights.
8. ELLIS stated that on Friday August 23, 2024, she traveled from San Antonio, TX to Sabinas in Nuevo Leon, MX to attend a wedding. She stayed a family friend's house and returned to the United States on Sunday August 25, 2024. ELLIS claimed to have driven straight to Laredo, TX without taking any detours. ELLIS said that she was the owner of the above-mentioned vehicle and that the paper tags displayed on the vehicle were given to her when she bought the vehicle. She denied that the TX license found inside the vehicle were registered to her and claimed that they were the vehicle's license plates before she bought the vehicle but were taken off and given the paper tag while her new ones arrived.
9. Further into the interview ELLIS changed her story and stated that about a week before the incident she was contacted through Facebook by a friend and asked is she was willing to transport drugs from Mexico to the United States (US). To which she said no. On Friday August 23, 2024, she traveled to Monterrey, Nuevo Leon, MX and stayed at the above-mentioned friend's house. On Saturday August 24, 2024, she discovered that her vehicle was missing but did not enquire about it because she was too afraid. Her vehicle was brought back on Sunday August 25, 2024, and she was told that she could no longer stay at her friend's house. She then departed towards the U.S. During the interview she asked several times if "these people were going to kill her and her family because they know where they live in San Antonio". ELLIS denied any knowledge about the contraband found inside her vehicle.

I declare (certify, verify, or state) under penalty of perjury that the forgoing is true and correct. Executed on the 26<sup>th</sup> day of August 2024.

  
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Ramon Deliz  
Special Agent  
Homeland Security Investigations

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer.

Executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

UNITED STATES MAGISTRATE JUDGE